

MATTHEW R. WALSH  
19197 GOLDEN VALLEY RD #333  
SANTA CLARITA, CA 91387  
(661) 644-0012

Plaintiff In Pro Per,

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

MATTHEW R. WALSH  
19197 GOLDEN VALLEY RD #333  
SANTA CLARITA, CA 91387,

Plaintiff In Pro Per,

vs.

ROKOKO ELECTRONICS  
(AND DOES 1 THROUGH 50, INCLUSIVE)  
31416 AGOURA RD STE 118  
WESTLAKE VILLAGE, CA  
91361

Defendant

Case No.: 2:25-CV-05340-ODW-RAO

Before: Hon. Otis D. Wright II  
Courtroom 5D

Hearing date: August 18, 2025  
Hearing time: 1:30PM

**REQUEST FOR JUDICIAL NOTICE IN  
SUPPORT OF PLAINTIFF'S MOTION  
TO STRIKE DEFENDANT'S REMOVAL**

**REQUEST FOR JUDICIAL NOTICE**  
**IN SUPPORT OF**  
**PLAINTIFF'S MOTION TO STRIKE DEFENDANT'S REMOVAL**

TO THE HONORABLE COURT:

Pursuant to Federal Rule of Evidence 201(b), Plaintiff respectfully requests that the Court take judicial notice of the following facts, each of which is either (1) not subject to reasonable

1 dispute because it is generally known within this Court's jurisdiction, or (2) can be accurately  
2 and readily determined from sources whose accuracy cannot reasonably be questioned.

3  
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5 This request supports Plaintiff's Motion to Strike Defendant's Notice of Removal and is  
6 based on evidence contained within this document.

7  
8 **REGARDING TIMING OF SUBMITTAL**

9  
10 Although FRE 201(d) & (e) allows judicial notice to be taken at any stage; Plaintiff offers  
11 an explanation in good-faith as to the submittal of these documents at this time and juncture.

12 These documents were discovered *after* filing Plaintiff's motion. Plaintiff intended on bringing  
13 these issues for oral argument; however, the hearing was vacated and so Plaintiff had to quickly  
14 re-collect evidence and assemble it in a short time. Plaintiff files this request in good-faith and  
15 asserts that each of these materials and facts presented are readily within Defendant's knowledge  
16 and grasp and none can possibly be a surprise. As the motion is undecided before this Court:  
17  
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19  
20 Plaintiff specifically requests judicial notice of the following:

21  
22 **I. FACTS AND RECORDS SUPPORTING LACK OF DIVERSITY**

23 **JURISDICTION**

- 24  
25  
26 1. **EXHIBIT A** - Public records show Rokoko Electronics, Inc. **owns** commercial  
27 **property** at 44 Tehama St., San Francisco and had a 2017 CA **property tax** lien  
28

(resolved). No sale appears of record. This directly contradicts “never a citizen” claims and establishes a California place of business/domicile.

2. **EXHIBIT B** – Board member **Stefano Corazza** (noticed DOE) **permanently resides and makes decisions from California**. This **defeats complete diversity** given his intended DOE (notified) status and decision-making role (identified in the pitch deck/Complaint).
3. **EXHIBIT C** – California SOS records through **2024** list **Jakob Balslev** (CEO/CFO/Secretary) at his luxury apartment at **4140 Cesar Chavez St., San Francisco**, showing residence and executive control concentrated in California (**Hertz “nerve center”**). Previously filed, un rebutted.
4. **EXHIBIT D** - Defendant’s **Creative Director lives/works in San Francisco (as of 8/16/2025)**, further supporting that core product decisions—and thus control—occur in California.
5. **EXHIBIT E** - Naver Z (a noticed DOE defendant), a major equity holder (~\$93M), is located in California, further defeating complete diversity. Previously referenced, un rebutted
6. **EXHIBIT F** - As of **8/16/2025**, Balslev **still lists** employment at **Rokoko San Francisco**. Not a generic LinkedIn artifact—other employees show differing

1 locales—**supporting California as the nerve center.** Previously filed,  
2 unrebutted.

3  
4  
5 **7. EXHIBIT G** - Defendant asserted it left CA in 2020 and has only one CA  
6 employee, omitting Corazza and Sam Lazarus; yet last was hiring in LA in 2022,  
7 contradicting the “one employee” narrative.

8  
9  
10 **8. EXHIBIT H** – Google search of Defendant’s website (including over 1,500  
11 pages, PDFs, blogs) shows no mention of Delaware as a place of business, further  
12 undermining any Delaware “principal place of business” claim.

13  
14 **9. EXHIBIT I** - Defendant’s LinkedIn lists Denmark and San Francisco—no  
15 Delaware—for locations, undercutting any assertion of a Delaware nerve  
16 center/domicile. Previously filed, unrebutted

17  
18  
19 **10. EXHIBIT J** – Defendant’s live careers page identifies San Francisco as an  
20 operational base with active/ongoing/intended hiring—evidence of continuing  
21 California operations and further no mention of Delaware.

22  
23  
24 **11. EXHIBIT K** - As of 8/16/2025, Defendant states it has teams in San Francisco  
25 and Los Angeles; no mention of Delaware or Copenhagen teams; only that  
26 Copenhagen is considered “HQ”. Previously filed, unrebutted.

1           **12. EXHIBIT L** – Email headers shows Overby sending from his Apple computer  
2           with an IP address which resolves ~300 km (~4 hrs) from Copenhagen to his  
3           home office internet account, contradicting his sworn “day-to-day” Copenhagen  
4           work claim.  
5

6  
7           **13. EXHIBIT M** - Overby’s emails resolve to a TDC home business account in  
8           Midtjylland, within the city of Tranbjerg (tip of a peninsula, across two islands)  
9           ~300 km away—[~8-hour daily commute]—undercutting “day-to-day”  
10          Copenhagen operations (see N, Q).  
11

12  
13          **14. EXHIBIT N** - Google Maps confirms ~4 hrs / 300 km (or ~3 hrs by car transport  
14          ferry) from Overby’s IP location to Copenhagen office, further contradicting his  
15          “day-to-day” claim (see M, Q).  
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18          **15. EXHIBIT O** - Social media as of 8/16/2025 shows Balslev’s residence as San  
19          Francisco, aligning with other records and supporting California as the nerve  
20          center (Hertz). Previously filed, un rebutted.  
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22  
23          **16. EXHIBIT P** – Plaintiff placed DOEs on litigation hold as far back as 5/14/2025,  
24          signaling forthcoming naming/amendment; many non-diverse, further impacting  
25          complete diversity.  
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1           **17. EXHIBIT Q** – Defendant Overby’s emails are sent from his home Apple device  
2                           on TDC home business internet ~300 km from Copenhagen—inconsistent with  
3                           claims of daily Copenhagen-based control (see L, N).  
4

5           **18. EXHIBIT R** - Defendant’s own source code shows the servers for the services  
6                           and software they provide are California/U.S. based servers (No Delaware or  
7                           Denmark). The server “rmp-auth.rokoko.cc” resolves to 3.167.212.66 and; the  
8                           server “rmp-auth.rokoko.rocks” resolves to 3.167.192.99; both are located in Los  
9                           Angeles at (Lat 34.05257, Lng -118.24321). The servers “rmp-auth.rokoko.com”  
10                          and “rmp-auth.rokoko.ninja” both resolve to 52.222.244.57 which is also located  
11                          in Los Angeles at (Lat 34.05257, -118.24391) at a different datacenter downtown  
12                          from the previous two. Defendant’s servers are actually located at the same exact  
13                          datacenter that Plaintiff’s servers are located (now owned by Hivelocity, prior  
14                          Rack City/ ONE WILSHIRE). Defendant was notified of the existence of this  
15                          evidence and did not rebut.  
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20           **19. EXHIBIT S** - USCIS records confirm Rokoko Electronics Inc. approved as an L-  
21                           1A petitioning employer in 2016. L-1A applies only when a U.S. company places  
22                           an executive/manager in the U.S. to direct, control, and coordinate operations at  
23                           an existing or newly established U.S. office—i.e., nerve-center functions.  
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28           **IV. COURT’S PRIOR STATEMENT ON DIVERSITY JURISDICTION**

1 Plaintiff further requests judicial notice of this Court's own prior language re: diversity  
2 citizenship (Docket #11)

3 **["This is extremely important.** Unlike state courts, federal courts are not courts  
4 of general jurisdiction, and can only preside over matters authorized by the Constitution  
5 and

6 Congress. *Bender v. Williamsport Area Sch. Dist.*, 475 U.S. 534, 541, 106  
7 S. Ct. 1326, 1331, 89 L. Ed. 2d 501 (1986). In other words, the party filing the action  
8 must **prove** to the Court that jurisdiction over the action exists **before** the Court can reach  
9 the merits of the complaint. *See Smith v. McCullough*, 270 U.S. 456, 459, 46 S. Ct. 338,  
10 339, 70 L. Ed. 682 (1926) (A "plaintiff, suing in federal court, must show in his pleading,  
11 affirmatively and distinctly, the existence of whatever is essential to federal  
12 jurisdiction . . .").

13 Federal jurisdiction may be alleged either pursuant to 28 U.S.C. section 1331  
14 for actions "arising under the Constitution, laws, or treaties of the United States," otherwise  
15 known as "federal question" jurisdiction, or 28 U.S.C. section 1332 as an action "between  
16 citizens of different States," otherwise known as "diversity" jurisdiction.

17 To allege federal question jurisdiction, the complaint should identify which right(s)  
18 the plaintiff(s) claim(s) have been violated, and which law, statute, or constitutional  
19 amendment provides that right. *See Keniston v. Roberts*, 717 F.2d 1295, 1298 (9th Cir.  
20 1983).

21 Diversity jurisdiction has **two** requirements. First, diversity jurisdiction requires  
22 complete diversity of citizenship, that is, all plaintiffs must have a different citizenship  
23 from all defendants. *See Owen Equipment & Erection Co. v. Kroger*, 437 U.S. 365, 373,  
24 98 S. Ct. 2396, 2402, 57 L. Ed. 2d 274 (1978). Residence and citizenship are distinct  
25 concepts, with significantly different jurisdictional ramifications: "[i]n order to be a  
26 citizen of a State within the meaning of the diversity statute, a natural person must both be  
27 a citizen of the United States **and** be domiciled within the State." *Newman-Green, Inc. v.*  
28 *Alfonzo-Larrain*, 490 U.S. 826,

828, 109 S. Ct. 2218, 2221, 104 L. Ed. 2d 893 (1989). "A person's  
domicile is her permanent home, where she resides with the intention to remain or to  
which she intends to return. A person residing in a given state is not necessarily domiciled  
there, and thus is not necessarily a citizen of that state." *Kanter v. Warner-Lambert Co.*,  
265 F.3d 853, 857 (9th Cir. 2001) (citations omitted). Corporations are citizens of both  
their state of incorporation and the state in which they have their principal place of  
business. 28 U.S.C. § 1332(c)(1); *see also New Alaska Dev. Corp. v. Guetschow*, 869 F.2d  
1298, 1300-01 (9th Cir. 1989). Unincorporated associations are citizens of the states of  
each member. *See Fifty Associates v. Prudential Ins. Co. of Am.*, 446 F.2d 1187, 1190  
(9th Cir. 1970). Second, when jurisdiction is based on diversity of citizenship, district  
courts do not have original jurisdiction unless a party alleges an amount in controversy  
exceeding \$75,000. 28 U.S.C. § 1332(a).

Finally, you should understand that it is **insufficient** for a party to merely claim  
that jurisdiction exists. Sufficient **facts** must be alleged to allow the Court to assess  
whether it has jurisdiction over the action."]

1  
2 **CONCLUSION**

3 The above matters are subject to judicial notice under FRE 201(b). They are either:  
4

- 5 • Public records, corporate disclosures, or filings.  
6 • Social media statements made by the Defendant and controlling officers.  
7 • Metadata and forensic evidence directly tied to the filings in this action.  
8 • Judicially noticeable facts regarding geography, contact information, business operations,  
9 and domicile.  
10

11  
12 Plaintiff requests judicial notice solely of the existence and contents of these records, not of any  
13 inferences that may be drawn therefrom and requests that the Court grant this judicial notice.  
14

15 **AUTHENTICATION CERTIFICATION OF ALL EVIDENCE**

16 I, Matthew R. Walsh, declare under penalty of perjury under the laws of the State of California  
17 that every document inclusive Exhibit A – Exhibit R is a true and correct copy of a document I  
18 personally received, created, or obtained in connection with this case, and it has not been  
19 materially altered.  
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Executed this 17 day of August, 2025 in Santa Clarita, California.

A handwritten signature in black ink, appearing to read "Matthew R. Walsh", is written over a horizontal line.

Matthew R. Walsh

Plaintiff in pro per

**EXHIBIT A**

Public records show Rokoko Electronics, Inc. owns commercial property at 44 Tehama St., San Francisco and had a 2017 CA property tax lien (resolved). No sale appears after of record. This directly contradicts "never a citizen" claims and establishes a California place of business/domicile.

Recording Requested By:  
City and County of San Francisco  
Treasurer & Tax Collector, BDR

When Recorded Mail To:

ROKOKO ELECTRONICS  
44 TEHAMA ST  
SAN FRANCISCO CA 94109

20179K55638400001  
San Francisco Assessor-Recorder  
Carmen Chu, Assessor-Recorder  
DOC 2017-K556384-00  
Acct 19-San Francisco Tax Collector  
Thursday, DEC 21, 2017 16:06:00  
Ttl Pd \$0.00 Nbr-0005732939  
okc/RE/1-1

SPACE ABOVE THIS LINE RESERVED FOR RECORDER'S USE

CITY AND COUNTY OF SAN FRANCISCO  
OFFICE OF TREASURER/TAX COLLECTOR

**CERTIFICATE OF LIEN FOR UNSECURED PROPERTY TAXES**

(Filed pursuant to California Revenue and Taxation Code Section 2191.3, 2191.4)

**THIS IS TO NOTIFY YOU THAT A TAX LIEN HAS BEEN FILED WITH RESPECT TO UNSECURED PROPERTY**

I, David P. Augustine, Tax Collector of the City and County of San Francisco, State of California, do hereby certify that there is on record in my office unpaid delinquent Unsecured Property taxes, which are duly assessed, computed and levied for the fiscal years shown, in compliance with the provisions of Division 1, Part 5, of the California Revenue and Taxation Code, in the amounts stated herein, together with delinquent penalties and fees levied pursuant to Section 2922 of the California Revenue and Taxation Code.

The person or persons named herein are liable to the City and County of San Francisco for the total unpaid amount as set forth herein:

**LOCATION OF PROPERTY** 0044 TEHAMA ST

ASSESSMENT NO	FISCAL YEAR
17-401816	2017-2018

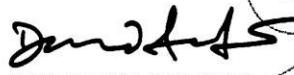
**OWNER NAME** ROKOKO ELECTRONICS

**LIEN AMOUNTS** \$800.86

Said address being the last known address of the assessee from and after the time of filing of this certificate, the total amount of unpaid tax and penalty required to be paid by each of the persons named constitutes a lien upon all personal and real property now owned by each of said person or persons, respectively, or that may subsequently be acquired by them, or any of them, before the date on which this lien expires.

The lien amount shown includes penalties, interest, collection costs and lien release fee. Additional interest will continue to accrue at the rate of one and one half (11/2) percent per month as prescribed by law. This lien has the force, effect and priority of a judgment for ten (10) years from the time of the recording of this instrument, unless sooner released or otherwise discharged.

**Dated:** Dec 20, 2017

  
David Augustine, Tax Collector  
CITY AND COUNTY OF SAN FRANCISCO

**EXHIBIT B**

Defendant's board member Stefano Corazza (noticed DOE) permanently resides and makes decisions from California. This defeats complete diversity given his intended DOE (noticed) status and decision-making role (identified in the pitch deck/Complaint).



**RECORDING REQUESTED BY:**  
Orange Coast Title Company of Northern  
California

**City and County of San Francisco**  
**Joaquin Torres, Assessor-Recorder**

Doc #	<b>2023046876</b>	Fees	\$20.00
6/30/2023	2:41:09 PM	Taxes	\$0.00
KC	Electronic	Other	\$0.00
Pages	3	Title	001
Customer	2233	SB2 Fees	\$0.00
		Paid	\$20.00

**When Recorded Mail Document To:**  
Ana Maya Koenig  
290 Richland Ave. #292  
San Francisco, CA 94110

**Escrow No.:** 525-SAC-23201462-71 -  
ST  
**Title No.:** 525-2371038-62

APN: 34-5745-058-01

SPACE ABOVE THIS LINE FOR RECORDER'S USE

**INTERSPOUSAL TRANSFER DEED**

(Excluded from reappraisal under California Constitution Article 13 A Section 1 et seq.)

The undersigned Grantor(s) declare(s) that the DOCUMENTARY TRANSFER TAX is: EXEMPT \$0.00

☒ This transfer is exempt from the documentary transfer tax.

**"This conveyance establishes sole and separate property of a spouse. R&T 11911"**

☐ The documentary transfer tax is computed on:

- ☐ the full value of the interest or property conveyed.
- ☐ the full value less the liens or encumbrances remaining thereon at the time of sale.

☒ The property is located in the City of San Francisco

This is an Interspousal Transfer and not a change in ownership under Section 63 of the Revenue and Taxation Code and Grantor(s) has (have) checked the applicable exclusion from reappraisal.

☒ One spouse to other

-A creation, transfer, or termination, solely between spouses, of any co-owner's interest.

FOR A VALUE CONSIDERATION, receipt of which is hereby acknowledged,

**Stefano Corazza, spouse of the grantee herein**

hereby GRANT(s) to

**Ana Maya Koenig, a married woman as her sole and separate property**

**the following described real property:**

See Exhibit A attached hereto and made a part hereof.

Commonly known as: 290 Richland Ave. #292, San Francisco, CA 94110

The grantor is executing this instrument for the purpose of relinquishing all of grantor's rights, title and interest, including, but not limited to, any community property interest in and to the land described herein and placing title in the name of the grantee as his/her separate property.

Exempt from fee per GC 27388.1 (a)  
(2); recorded concurrently "in connection with" a transfer subject to the imposition of documentary transfer tax (DTT).

**MAIL TAX STATEMENTS AS DIRECTED ABOVE**

INTERSPOUSAL TRANSFER DEED

## EXHIBIT C

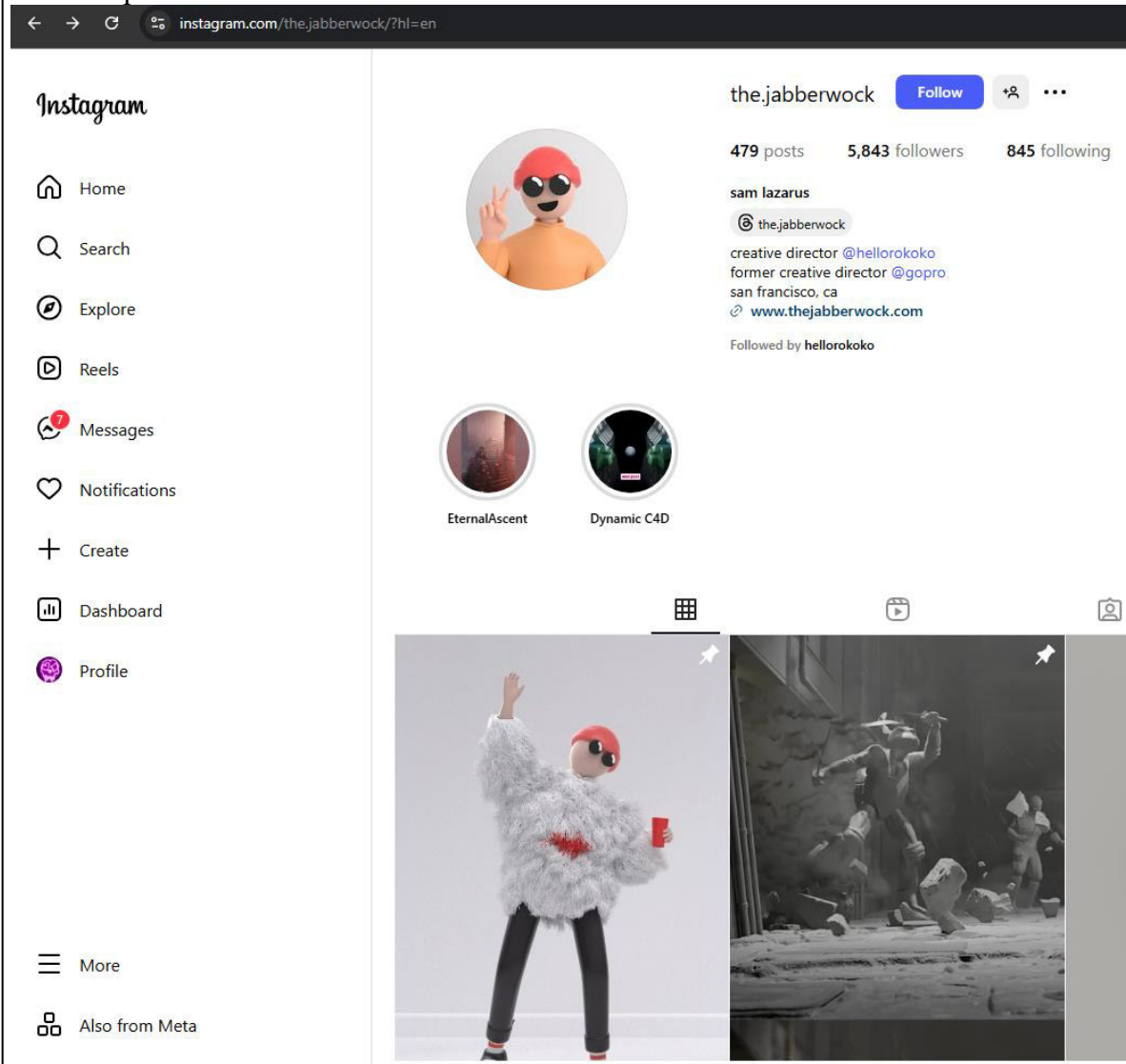
California SOS records through 2024 list Jakob Balslev (CEO/CFO/Secretary) at his luxury apartment at 4140 Cesar Chavez St., San Francisco, showing residence and executive control concentrated in California (Hertz “nerve center”). Previously filed, unrebutted.

The screenshot displays the 'History' section of the California Secretary of State's business records website. It shows a list of amendments for two entities, each with a table of changes.

Amendment Type	Field Name	Changed From	Changed To
Statement of Information	Annual Report Due Date	3/31/2024 12:00:00 AM	3/31/2025 12:00:00 AM
Control ID			
BA20241277973			
Date			
7/10/2024			
Image Download			
<a href="#">Download</a>			
Statement of Information	Annual Report Due Date	3/31/2023 12:00:00 AM	3/31/2024 12:00:00 AM
Control ID			
BA20231321569			
Date			
8/23/2023			
Image Download			
<a href="#">Download</a>			
System Amendment - SOS Revivor	Filing Status	Forfeited - SOS	Active
Control ID	Inactive Date	10/27/2021 12:00:00 AM	None
BA20220408168			
Date			
6/21/2022			
System Amendment - SOS Forfeited			
Control ID			
BA20220408168			
Date			
10/27/2021			

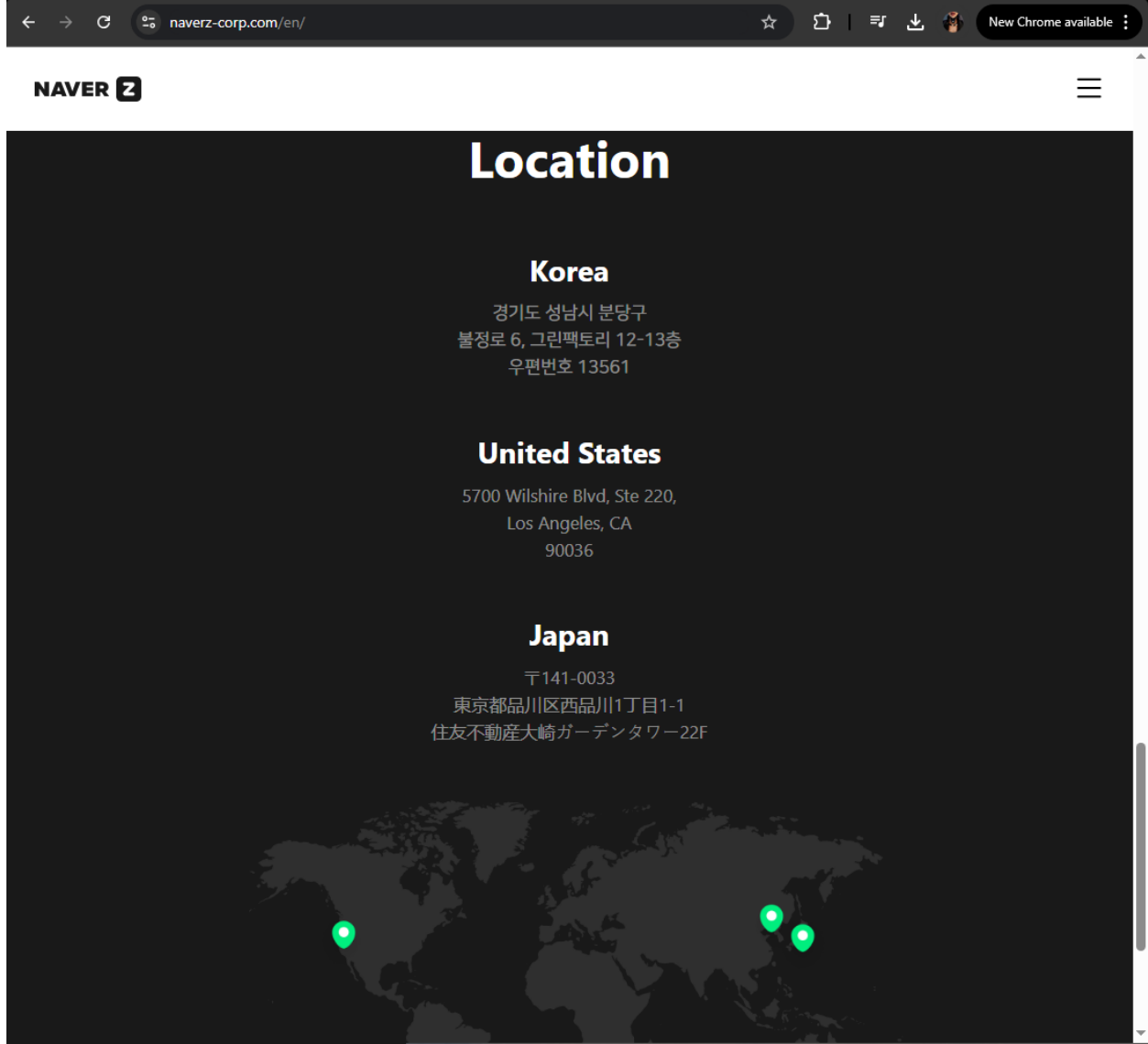
**EXHIBIT D**

Defendant's Creative Director lives/works in San Francisco (as of 8/16/2025), further supporting that core product decisions—and thus control—occur in California.



**EXHIBIT E**

Naver Z (a noticed DOE defendant), a major equity holder (~\$93M), is located in California, further defeating complete diversity (previously referenced, unrebutted).



**EXHIBIT F**

As of 8/16/2025, Balslev still lists employment at Rokoko San Francisco. Not a generic LinkedIn artifact—other employees show differing locales—supporting California as the nerve center. Previously filed, un rebutted.

The screenshot displays the LinkedIn profile of Jakob Balslev, identified as CEO & Founder of Rokoko. The profile is viewed on a desktop browser, with the URL [linkedin.com/in/jakob-balslev/?locale=en\\_US](https://www.linkedin.com/in/jakob-balslev/?locale=en_US) visible in the address bar. The navigation bar includes links for Home, My Network, Jobs, Messaging (with 1 notification), and Notifications (with 9 notifications). The profile header shows a profile picture and the name Jakob Balslev, CEO & Founder, Rokoko.

The **Experience** section lists the following roles:

- CEO & Co-founder** at **Rokoko** (Mar 2014 - Present · 11 yrs 6 mos, San Francisco Bay Area). The company website [www.rokoko.com](http://www.rokoko.com) is listed. Three small images are shown below the title: a person in a blue shirt, a person in a red shirt, and a person in a blue shirt.
- Global Shaper** at **World Economic Forum** (Jul 2015 - Jul 2017 · 2 yrs 1 mo). The website <https://www.globalshapers.org/> is listed.
- Producer** at **Zentropa** (Jun 2013 - Mar 2014 · 10 mos). Two URLs are listed: <http://www.dfi.dk/faktaomfilm/person/en/172673.aspx?id=172673> and [http://www.imdb.com/name/nm2802638/?ref=fn\\_al\\_nm\\_1](http://www.imdb.com/name/nm2802638/?ref=fn_al_nm_1).
- Producer assistant** at **Nordisk Film** (Aug 2007 - Aug 2009 · 2 yrs 1 mo). The URL [http://www.imdb.com/name/nm2802638/?ref=fn\\_al\\_nm\\_1](http://www.imdb.com/name/nm2802638/?ref=fn_al_nm_1) is listed.

The **Education** section lists the following institutions:

- The National Film School of Denmark** (Filmproducer, 2009 - 2013, Grade: MA).
- European Film College** (2006 - 2007).

The URL <https://www.linkedin.com/company/165212/> is visible at the bottom of the profile page.




## EXHIBIT G


Defendant asserted it left CA in 2020 and has only one CA employee, omitting Stef Corazza and Sam Lazarus; yet last was hiring in LA in 2022, contradicting the “one employee” narrative.


← → ↺

glassdoor.com/Salary/Rokoko-Project-Manager-Salaries-E1895865\_D\_K07,22.htm

Bowls

 Job Hunting in Tech

 Software Engineering

 Tech

Show more ▾

Followed companies

Stay ahead in opportunities and insider tips by following your dream companies.

Search for companies

Job searches

Game Developer

79 jobs

See all job activities →

Get feedback on your pay or offer

Create an anonymous post and get feedback on your pay from other professionals.

See how it works

Project Manager

Take a \$135K/yr Senior PM offer in Seattle?

Chicago, IL · Del Technologies

4 hr ago

Sr. Project Manager

2 hr


Recent salaries shared by Project Manager at Rokoko ⓘ

📍 Location

All years of experience ▾

1 salaries

Sort by most recent ▾

Job Title   Years of Experience	Total Pay ⓘ
Location	Base · Additional pay
Date submitted	
Anonymously share your salary to help the community. <div>Add a Salary</div>	
<b>Project Manager   1-3 years</b>	<b>\$33K - \$38K/yr</b>
Los Angeles, CA	
 submitted on Jan 14, 2022	

< 1 >

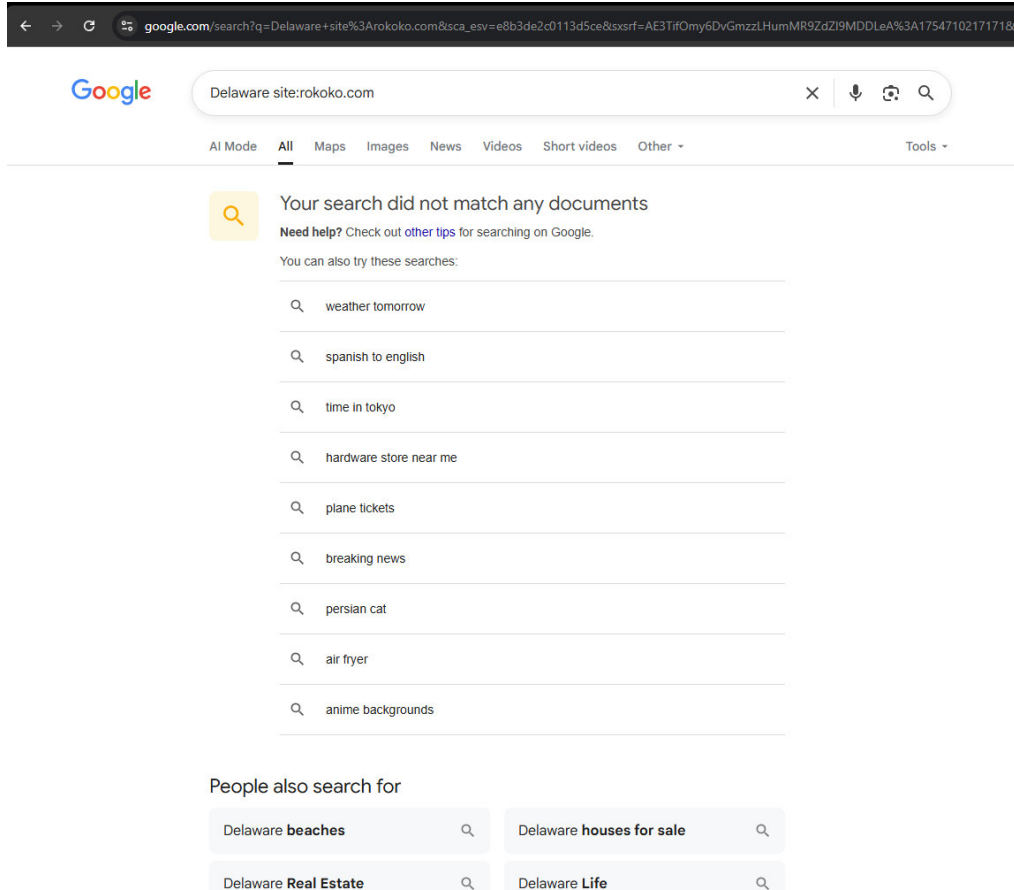
Viewing 1 - 1 of 1

Rokoko pay FAQs

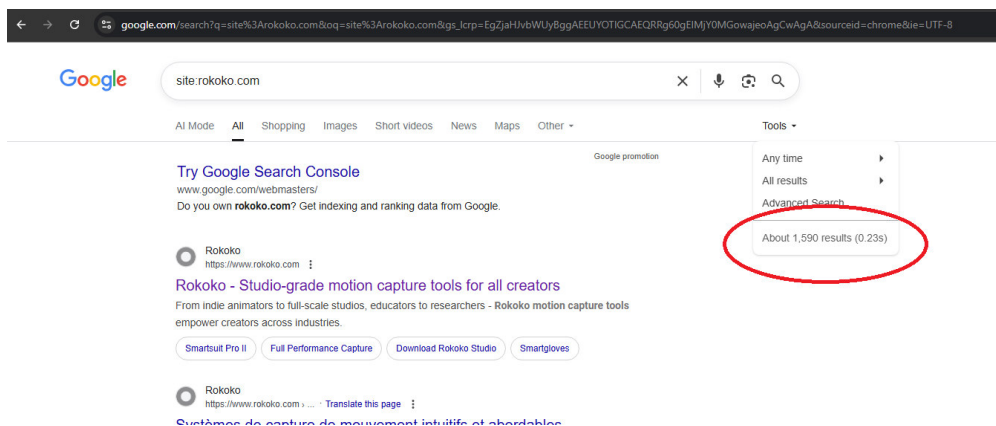


## **EXHIBIT H**

Google search of Defendant's site (including all 1500+ pages, PDFs, blogs) shows **no mention of Delaware** whatsoever, much less as a place of business, further undermining any Delaware "principal place of business" claim.

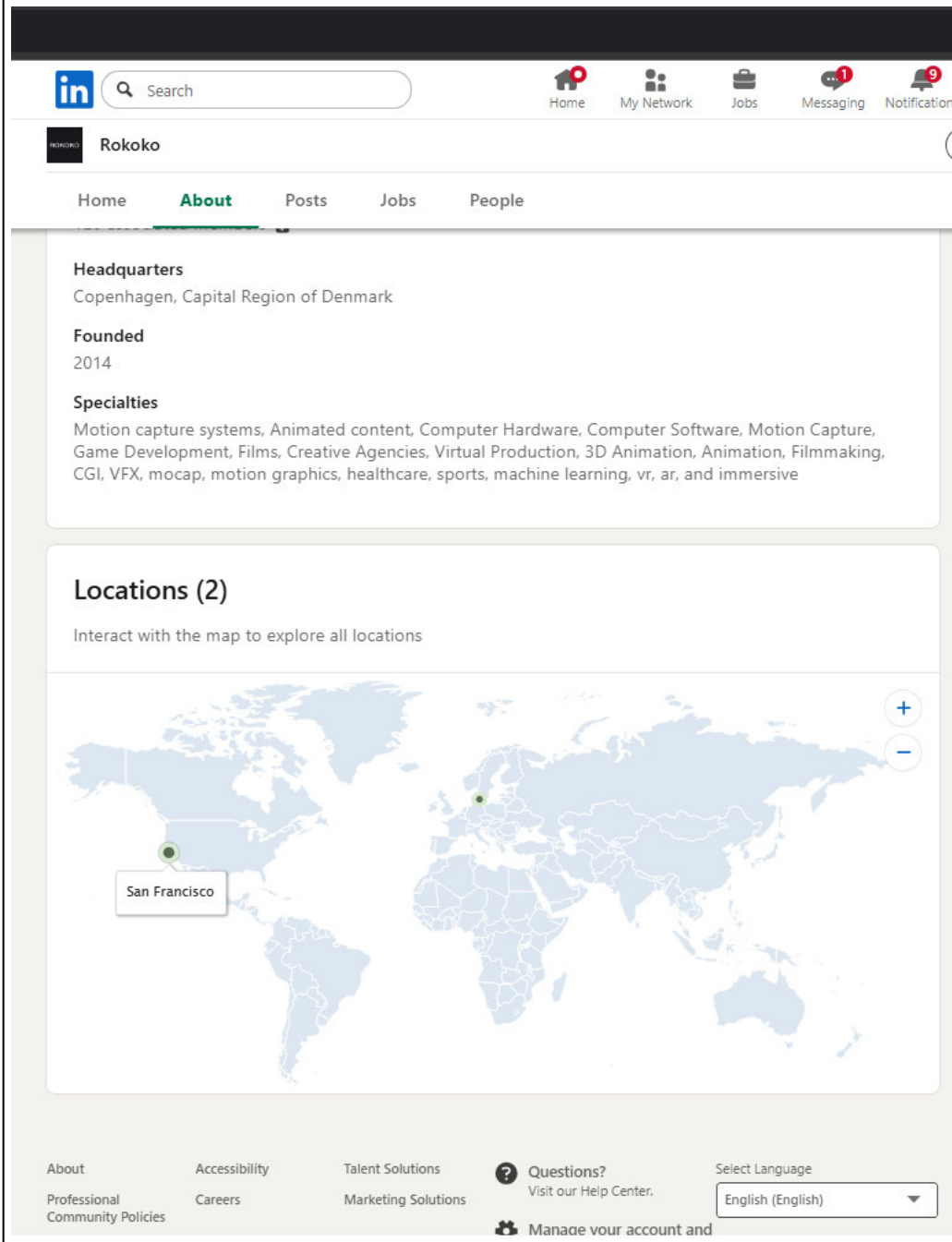


Google indexes over 1500 pages from Defendant's site:



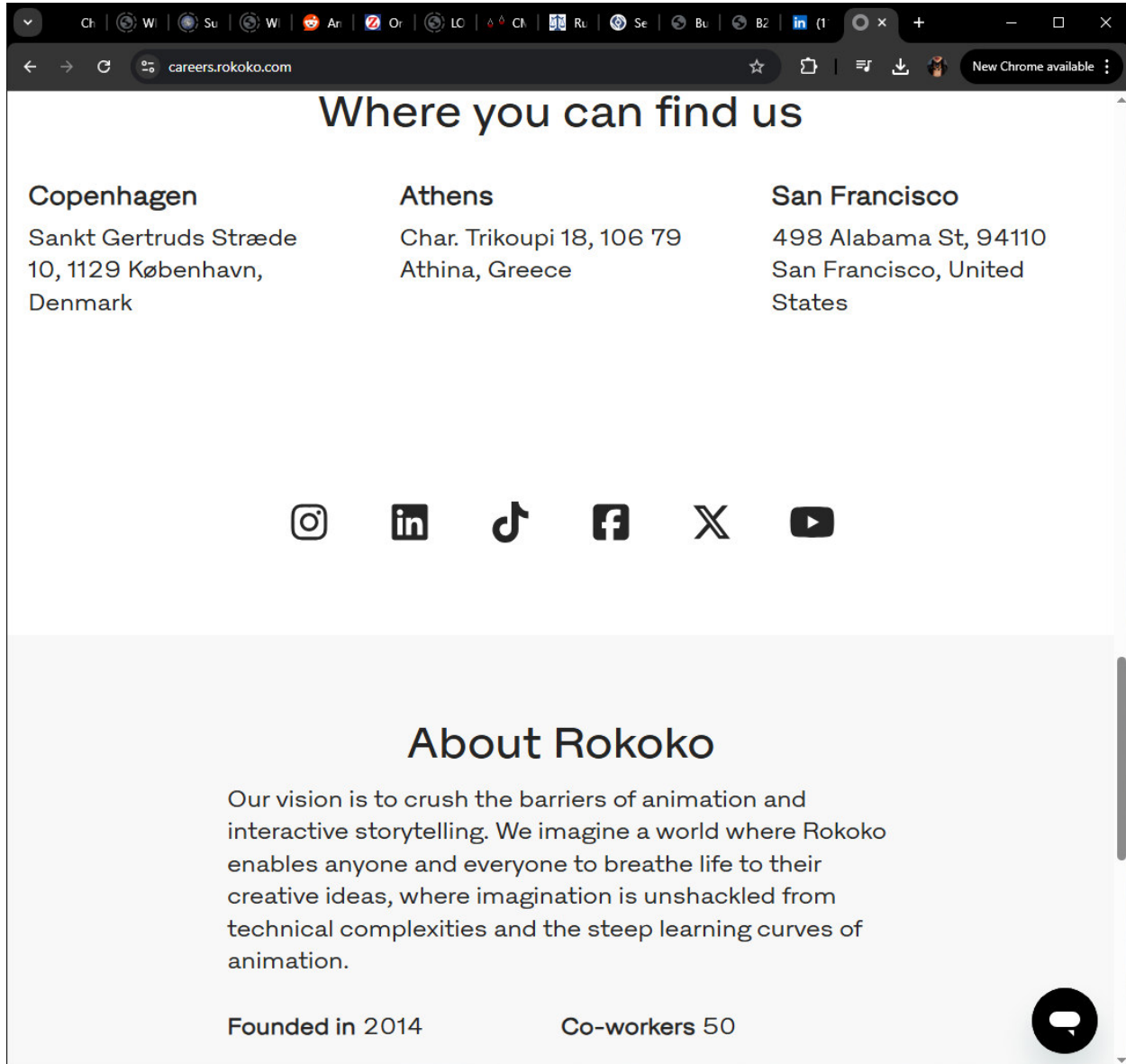
**EXHIBIT I**

Defendant's LinkedIn lists Denmark and San Francisco—no Delaware—for locations, undercutting any assertion of a Delaware nerve center/domicile.



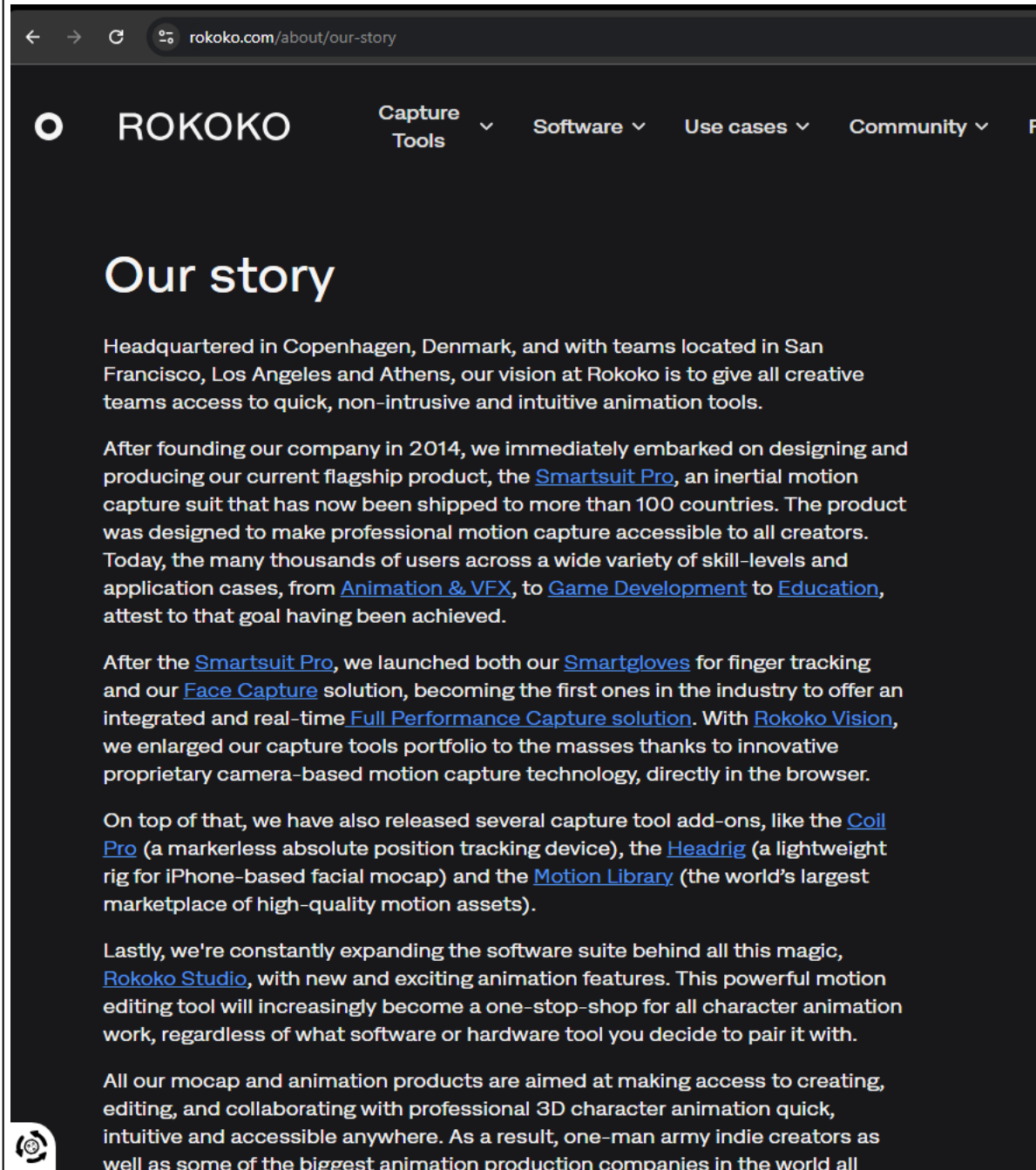
**EXHIBIT J**

Defendant's live careers page identifies San Francisco as an operational base with active/ongoing/intended hiring—evidence of continuing California operations and further no mention of Delaware.



## EXHIBIT K

As of 8/16/2025, Defendant states it has teams in San Francisco and Los Angeles; no mention of Delaware or Copenhagen teams; only that Copenhagen is considered “HQ”. Previously filed, unrebutted.



**EXHIBIT L**

Consistent e-mail headers shows Overby sending from his Apple computer with his IP address which resolves ~300 km (~4 hrs) from Copenhagen to his home office internet account, contradicting his sworn “day-to-day” Copenhagen work claim.

```
Received: from mail-lf1-f47.google.com ([209.85.167.47]:48584)
  by gator3161.hostgator.com with esmtps (TLS1.2) tls
  TLS_ECDHE_RSA_WITH_AES_128_GCM_SHA256
  (Exim 4.98.1)
  (envelope-from <mikkel@rokoko.com>)
  id luBwvc-00000003e1Z-3Rh7
  for matthew@winteryear.com;
  Mon, 05 May 2025 09:36:22 -0500
Received: by mail-lf1-f47.google.com with SMTP id 2adb3069b0e04-54d65cb6e8aso5786573e87.1
  for <matthew@winteryear.com>; Mon, 05 May 2025 07:36:15 -0700 (PDT)
Received: from smtpclient.apple ([87.48.131.206])
  by smtp.gmail.com with ESMTPSA id 2adb3069b0e04-
  54ea94ee377sm1703494e87.155.2025.05.05.07.36.03
  (version=TLS1_2 cipher=ECDHE-ECDSA-AES128-GCM-SHA256 bits=128/128);
  Mon, 05 May 2025 07:36:04 -0700 (PDT)
Received: from gator3161.hostgator.com
  by gator3161.hostgator.com with LMTP
  id sBZGEebMGGgTdGkANiI7Wg
  (envelope-from <mikkel@rokoko.com>)
  for <matthew@winteryear.com>; Mon, 05 May 2025 09:36:22 -0500
From: "Mikkel Lucas Overby" <mikkel@rokoko.com>
To: <matthew@winteryear.com>
References: <144601dbbd7b$bd3696a0$37a3c3e0$@winteryear.com>
In-Reply-To: <144601dbbd7b$bd3696a0$37a3c3e0$@winteryear.com>
Subject: Re: Case dismissed, new case filed.
Date: Mon, 5 May 2025 07:35:52 -0700
Message-ID: <CCFBA9DB-AED1-4743-A7A6-0B3D9E94D715@rokoko.com>
MIME-Version: 1.0
Content-Type: multipart/mixed;
  boundary="-----_NextPart_000_0D7E_01DBBEE1.AF0AC800"
X-Mailer: Apple Mail (2.3826.200.121)
Thread-Index: AQGUOKLTESyQtKTrWT+Fc+NUKK5DAHtA2T5
X-Google-DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
  d=1e100.net; s=20230601; t=1746455768; x=1747060568;
  h=references:to:in-reply-to:subject:date:mime-version:message-id:from
  :x-gm-message-state:from:to:cc:subject:date:message-id:reply-to;
  bh=r/lgEntD5pJT3l+aSlMkXsdFZQ0a4PiZiIlLz5uUOcY0=;
  b=A2tvG8G0ZPCE94muXvQpsfDwvZakjy9fv12kgKWZ5Y3wKsERS+nCkaqX8ARPORNV
  718wNkbHZYxqmev12ZECxl/7Ey3y5MUpDcLzLR9Mz+2uLgblu4ti8twlgun1KF6Ledo
  VyaA9DyATNopf6XzBTjPgflCWpWdVxde9FzmyD+LKNiQuHmrhbcP2sthUVgt8ZWYEYPv
  WD0lnV+m8Maam+6j/g5Vz1IqD0+eNod3vwfOajPiZvBrDAFu8uN22oYBc58GTSbChZpI
  8E+AHImc8kGAbQNSXeYEst6S2dJAYDw2J7aP9R5w6o8vI9Q/DRo8hx0SIgR+tM7TI/ll
  aN2A==
X-Gm-Message-State: AOJu0YwElQeYy69Y2YPcJdiGYukSUVN14EB5rTkftUpnBW8fQH7Qcd
  Un9m2247WLGiq5d2twlreZbFnHcZAXnb0YXJLGYcXRiNU5dQAaQ6Jrti5hHbOAqgxPwnwM9jWjK
  DwPdIUg==
X-Google-Smtp-Source:
  AGHT+IHVkJ0A2S7+kDzPQXXO+Qt7nQCUSY/z/jkMNYJKuQ2G6blYxm6p8bB3KYKZ8j5RQ5fhnyz249Q==
X-Received: by 2002:a05:6512:318a:b0:54b:117b:dc9d with SMTP id 2adb3069b0e04-
  54eb2479520mr1968579e87.55.1746455765256;
  Mon, 05 May 2025 07:36:05 -0700 (PDT)
X-Gm-Gg: ASbGnctS8FFinkvy01lX7zAVtM8YCoL5TzSjjs1gz8FRERNA0G9VjJTr1LFx9qC/2A
  2e41mAk1qikCdh5UNDxYRJZZDw8w/K2gopIVbat88LQWSEk7+5M+9VMympZWktGbyH3WXQ4FXur
  ZYuM3FHHJHjxKyO/mC9Sv//AGyK0Hiup/L1Fff5xyYTeA9IDLy5fUg/RZPFQE+RiqrzpjgjuU8Z
  sdlenzo7ZcvhkU13HH6131GwYp1S/0bNb/4FiBV3XBxU2gZ7Dxt3bpBpQ4Skyoe64Gj7n4Ek2j6
  zGxTkPdwoW/rLLXRMFj1NhFPVzOocaF0oZBxS+zF+lpHZtySplrv8Q==
```

## EXHIBIT M

Overby's emails resolve to a TDC home business account in Midtjylland, within the city of Tranbjerg (tip of a peninsula, across two islands) ~300 km away—[~8-hour daily commute]—undercutting “day-to-day” Copenhagen operations (see N, Q).

The top screenshot shows the GeoLocation website with a map of Denmark. A red pin is located in Tranbjerg. The table below the map provides the following data:

Country	Denmark	Region	Midtjylland	City	Tranbjerg
ZIP or Postal Code	8361	Latitude	56.09012	Longitude	10.11907
ISP	TDC Holding A/S	Domain Name	tdc.dk [WHOIS] [Check Mail Server]	Usage Type	ISPMOB
Weather	View Weather	Time Zone	Europe/Copenhagen	Local Time	2025-08-16T21:55:42+02:00
Address Type	Unicast	Category	Internet Technology	District	Aarhus Municipality

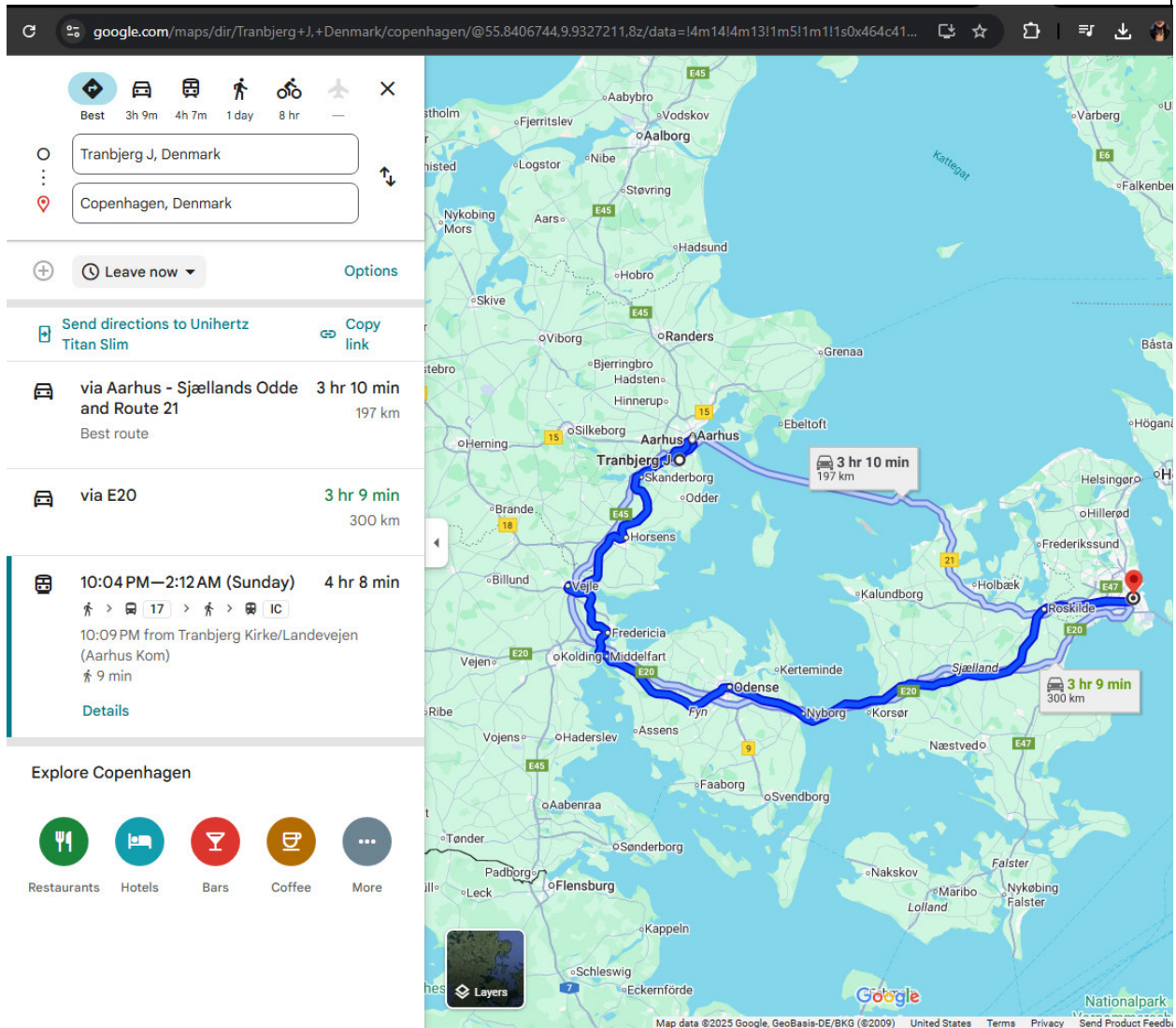
The bottom screenshot shows the same website with a more detailed map of Tranbjerg. The table below the map provides the following data:

Country	Denmark	Region	Midtjylland	City	Tranbjerg
ZIP or Postal Code	8361	Latitude	56.09012	Longitude	10.11907
ISP	TDC Holding A/S	Domain Name	tdc.dk [WHOIS] [Check Mail Server]	Usage Type	ISPMOB
Weather	View Weather	Time Zone	Europe/Copenhagen	Local Time	2025-08-16T21:55:42+02:00
Address Type	Unicast	Category	Internet Technology	District	Aarhus Municipality



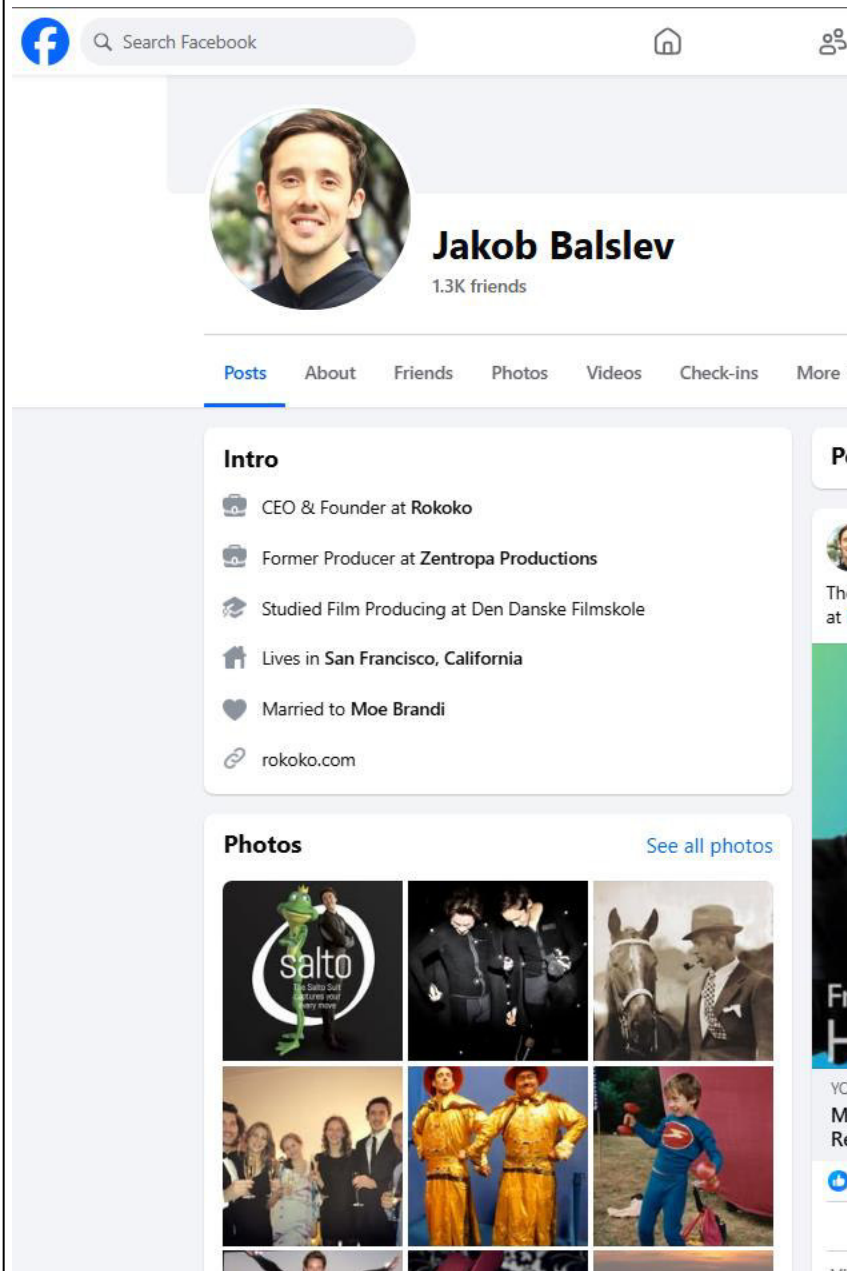
## EXHIBIT N

Google Maps confirms ~4 hrs / 300 km (or ~3 hrs by car transport ferry) from Overby's IP location to Copenhagen office, further contradicting his "day-to-day" claim (see M, Q).



**EXHIBIT O**

Social media as of 8/16/2025 shows Balslev's residence as San Francisco, aligning with other records and supporting California as the nerve center (Hertz). Previously filed, un rebutted.





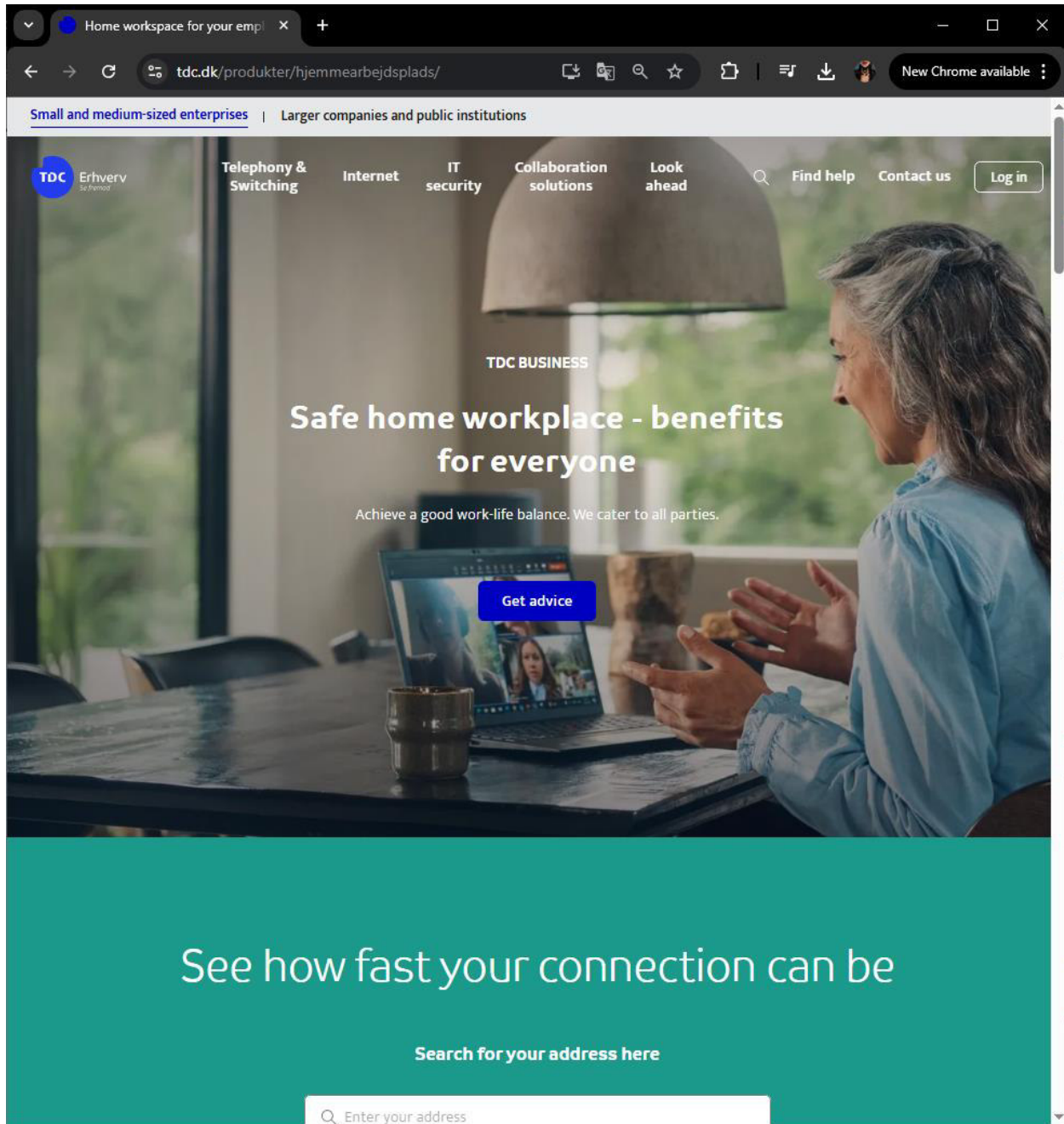
## EXHIBIT P

Plaintiff placed DOEs on litigation hold as far back as 5/14/2025, signaling forthcoming naming/amendment; many non-diverse, further impacting complete diversity.

!	lyngby@ltk.dk	LITIGATION HOLD	NOTICE: Walsh v Rokoko (also Coco/Rokoko Car... Wed 5/21/2... 17 KB
	I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not		
!	gentofte@gentofte.dk	LITIGATION HOLD	NOTICE: Walsh v Rokoko (also Coco/Rokoko Car... Wed 5/21/2... 17 KB
	I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not		
!	lyngby@ltk.dk	FW: LITIGATION HOLD	NOTICE: Walsh v Rokoko (also Coco/Rokoko... Wed 5/21/2... 17 KB
	I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not		
!	info@borger.dk; post@borger.dk	LITIGATION HOLD	NOTICE: Walsh v Rokoko (also Coco/Rokoko Car... Wed 5/21/2... 17 KB
	I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not		
!	post@haderslev.dk	LITIGATION HOLD	NOTICE: Walsh v Rokoko (also Coco/Rokoko Car... Wed 5/21/2... 17 KB
	I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not		
	mikkel@cococare.io	LITIGATION HOLD	NOTICE: Walsh v Rokoko (Case No. 25STCV1382... Wed 5/21/2... 9 KB
	Matthew R. Walsh Plaintiff in pro per (661) 644-0012 <end>		
	Roblox Support	RE: Roblox Support Ticket 120441610	Thu 5/15/2... 33 KB
	LITIGATION HOLD	NOTICE: Walsh v Rokoko (Case No. 25STCV13828) - Los Angeles Superior Court This is for Steven Corazza,	
	ZEPETO	Re: [ZEPETO] 달장: LITIGATION HOLD	NOTICE: Walsh v Rokoko (Cas... Wed 5/14/2... 13 KB
	As your company is a Rokoko investor, it shares in the risk in addition to the reward. There is active litigation possibly		
!	brettbibby@mac.com; brettb@unity3d...	LITIGATION HOLD	NOTICE: Walsh v Rokoko (Case No. 25STCV1382... Wed 5/14/2... 19 KB
	I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not		
!	thomas@vistunlimited.com; legal@vis...	LITIGATION HOLD	NOTICE: Walsh v Rokoko (Case No. 25STCV1382... Wed 5/14/2... 18 KB
	I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not		
!	info@nev.nu	LITIGATION HOLD	NOTICE: Walsh v Rokoko (Case No. 25STCV1382... Wed 5/14/2... 16 KB
	I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not		
!	Ashley_Mccormack@vfc.com	LITIGATION HOLD	NOTICE: Walsh v Rokoko (Case No. 25STCV1382... Wed 5/14/2... 17 KB
	I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not		
!	legal@naverz-corp.com; info@naverz...	LITIGATION HOLD	NOTICE: Walsh v Rokoko (Case No. 25STCV1382... Wed 5/14/2... 17 KB
	I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not		
!	legal@trifork.com; info@trifork.com; ...	LITIGATION HOLD	NOTICE: Walsh v Rokoko (Case No. 25STCV1382... Wed 5/14/2... 22 KB
	I'm reaching out as the plaintiff in an active legal case (Walsh v. Rokoko filed in California Superior Court) alleging (but not		

**EXHIBIT Q**

Defendant Overby's emails are sent from his home Apple device on TDC home business internet ~300 km from Copenhagen—inconsistent with claims of daily Copenhagen-based control (see L, N).



```

this.Environment = env;
this._setStudioOptIn = appConsumer.Studio == AuthConsumer.Studio;
this._pubApi = new RmpPublicApi(logger, this.Environment);

public Authentication(Serilog.ILogger logger, AuthEnvironment env = AuthEnvironment.Production, int timeoutSeconds = 6)
    : this(logger, AuthConsumer.Studio, env, timeoutSeconds)
{
}

public void SetSession(UserSession session) => this._session = session;

public AwsCognitoConfig getConfig() => this._config;

private static AwsCognitoConfig GetConfig(AuthConsumer appConsumer, AuthEnvironment env)
{
    switch (env)
    {
        case AuthEnvironment.Development:
            return new AwsCognitoConfig()
            {
                environmentId = "dev-ropokoko",
                domain = "rokoko.ninja",
                cognitoServiceUrl = "https://rmp-auth.rokoko.ninja",
                cognitoUserPoolId = "us-east-1_TAIvR8DCY",
                cognitoClientId = Authentication.Trans("0f00y9oosRoCCuB56R6UEFER", (short) -284),
                cognitoClientSecret = Authentication.Trans("{{}}{}{}_f".Format(), (short) -691)
            };
        case AuthEnvironment.DevRelease:
            return new AwsCognitoConfig()
            {
                environmentId = "dev-release",
                domain = "rokoko.cc",
                cognitoServiceUrl = "https://rmp-auth.rokoko.cc",
                cognitoUserPoolId = "us-east-1_OcBC8D0Bo",
                cognitoClientId = Authentication.Trans("ADEK1 ex\U0838W\x'µuIXE'e''\U08BDIz", (short) -852),
                cognitoClientSecret = Authentication.Trans("\u00B22a\u00B9â, iñjâeê,âôï\u00B9ôï÷çææ\u00B3âëuçeiäi\u00B3âiñië\u00B9ðää&÷ó", (short) -129)
            };
        case AuthEnvironment.Staging:
            return new AwsCognitoConfig()
            {
                environmentId = "staging",
                domain = "rokoko.rocks",
                cognitoServiceUrl = "https://rmp-auth.rokoko.rocks",
                cognitoUserPoolId = "us-east-1_gupQw69Z",
                cognitoClientId = Authentication.Trans("On00000phn0m0E0L1N11N", (short) -218),
                cognitoClientSecret = Authentication.Trans("šHŹu0G0G0đH0ioH0đ0iiGHijHfiH0i0G0gHig0điögiñi", (short) -189)
            };
        case AuthEnvironment.Production:
            return new AwsCognitoConfig()
            {
                environmentId = "production",
                domain = "rokoko.com",
                cognitoServiceUrl = "https://rmp-auth.rokoko.com",
                cognitoUserPoolId = "us-east-1_Sbm9F1Rx",
                cognitoClientId = Authentication.Trans("šüVÿçâ+A'-âš'uê+°V'iâiâ", (short) -124),
                cognitoClientSecret = Authentication.Trans("İngıñdñAŸuZyñbnşüjññBŸuwoqıeozıŷienŸŸuŸnyŸAzŷl", (short) -514)
            };
        default:
            return (AwsCognitoConfig) null;
    }
}

```

```
public async Task<CognitoResult> SignUp(SignUpParams signUpParams, CancellationToken ct)
{
    if (string.IsNullOrEmpty(signUpParams.email) || string.IsNullOrEmpty(signUpParams.password))
        return CognitoResult.InvalidInput;
    Dictionary<string, string> userAttributes = new Dictionary<string, string>()
    {
        ["email"] = signUpParams.email,
        ["custom:mailing_list"] = signUpParams.optInMailingList ? "true" : "false"
    };
    if (!string.IsNullOrEmpty(signUpParams.givenName))
        userAttributes["given_name"] = signUpParams.givenName;
    if (!string.IsNullOrEmpty(signUpParams.familyName))
        userAttributes["family_name"] = signUpParams.familyName;
    if (signUpParams.jobArea != JobArea.Undefined)
        userAttributes["custom:job_area"] = this.MapJobArea(signUpParams.jobArea);
    if (signUpParams.organizationSize != OrganizationSize.Undefined)
        userAttributes["custom:organization_size"] = Authentication.MapOrganizationSize(signUpParams.organizationSize);
    if (this._setStudioOptIn)
    {

```

## EXHIBIT S

USCIS records confirm Rokoko Electronics Inc. approved as an L-1A petitioning employer in 2016. L-1A applies only when a U.S. company places an executive/manager in the U.S. to direct, control, and coordinate operations at an existing or newly established U.S. office—i.e., nerve-center functions.

Screenshot of the USCIS website showing the "Approved L1 Petitions by Employer Fiscal Year 2016" table. The table lists various employers, including Rokoko Electronics Inc., and their corresponding petition statistics.

EMPLOYER TAX ID (Last 4 Digits)	EMPLOYER NAME	EMPLOYER INDUSTRY	TOTAL APPROVED PETITIONS	EMPLOYMENT TYPE	CLASS PREFERENCE	APPROVED PETITIONS BY CLASS PREFERENCE
2580	ORBI RESTAURANT SEATTLE CO LTD		0	Initial	L1A	0
2641	SPATIAL TEST INC		0	Initial	L1A	0
3111	ROKOKO ELECTRONICS INC		0	Initial	L1A	0
3117	WYOTRON USA INC		0	Continuing	L1A	0
3185	GLORIFY PHARMA LLC		0	Initial	L1A	0
3947	GLUMMER USA TECHNOLOGY LLC		0	Initial	L1A	0
5577	UNITED PACIFIC GRP		0	Continuing	L1A	0
6339	ARBOREUM PHARMA CORP		0	Continuing	L1A	0
6592	MECANOD USA INC		0	Initial	L1B	0
6934	DREAM HOUSE PROPERTY MGT INC		0	Continuing	L1A	0
6952	CLASSING AMERICA INC		0	Initial	L1A	0
7082	ALPHA FASHION USA INC		0	Initial	L1A	0
7141	DE RUCCI BREDDING USA INC		0	Initial	L1A	0
7734	AUTO CYCLONE LLC		0	Initial	L1A	0
7854	ALT CONSULTING GROUP INC		0	Initial	L1A	0
7954	AN PHUOC USA INC		0	Initial	L1A	0
8809	TGAUSA		0	Initial	L1A	0
9009	PIPLE GROUP INVESTMENTS LLC		0	Initial	L1A	0
9172	AMERICA LUANTE INC		0	Continuing	L1A	0
0015	STRETCHEURROS INC		0	Initial	L1A	0
0113	W KALBRE EQUIPMENT LTD		0	Initial	L1A	0
0708	BW LED LIGHTING LLC		0	Initial	L1A	0
1860	VERSO LEARNING INC		0	Initial	L1B	0
2001	INCOMPATIBLES INC		0	Initial	L1A	0
2173	ANTE BUILDING LLC		0	Initial	L1A	0
3781	BETTER AND ENJOY REAL ESTATE INVE		0	Initial	L1A	0
3845	INTERTELL USA INC		0	Initial	L1A	0
4075	WESTLAND AUTO CENTER LLC		0	Initial	L1A	0
4506	VERDE CORPORATION		0	Initial	L1A	0

The screenshot also shows the USCIS website navigation menu and the "Working in the United States" section, which includes links to "Temporary Workers" and "L-1A Intracompany Transferee Executive or Manager".